

**IN THE UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

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	:	Chapter 9
In re	:	
	:	Case No. 13-53846
CITY OF DETROIT, MICHIGAN,	:	
	:	Hon. Thomas J. Tucker
Debtor	:	
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**STIPULATION FOR ENTRY OF ORDER ALLOWING CLAIM NO. 3725 OF THE  
STATE OF MICHIGAN IN A REDUCED AMOUNT**

The State of Michigan (the “State”) and the City of Detroit, Michigan (the “City”), by and through their undersigned counsel, stipulate as follows in support of the entry of the *Order Allowing Claim No. 3725 of the State of Michigan in a Reduced Amount* attached hereto as **Exhibit 1**.

1. On June 2, 2014, the State filed its proof of claim [Claim No. 3725] (the “Claim”) in the amount of \$5,766.00.
2. Of that total amount, \$4,637.58 related to post-petition invoices, which were inadvertently included in the Claim. Such post-petition amounts will be handled in the City’s ordinary course of business.
3. Upon discussion, the parties determined that the Claim should be reduced to \$1,128.13, none of which is entitled to administrative priority.
4. Therefore, the parties have agreed to allow Claim No. 3725 as a general unsecured claim in the amount of \$1,128.13, provided, however, that nothing in this stipulation is to be construed as a waiver of any of the City’s rights to assert and pursue any claims against

the State including, without limitation, claims under Chapter 5 of the Bankruptcy Code, and to challenge the assertion of Claim 3725 as a defense to such claims.

**WHEREFORE** the parties respectfully request that the Court enter an order in the form attached hereto as **Exhibit 1** approving the parties' stipulation.

Respectfully submitted by:

<b>LAMBERT LESER</b>  By: <u>/s/ Rozanne M. Giunta (w/ consent)</u> Rozanne M. Giunta 309 Davidson Bldg. Bay City, MI 49707 Phone: (989) 893-3517 rgiunta@lambertleser.com  <i>Counsel to the State of Michigan</i>	<b>FOLEY &amp; LARDNER, LLP</b>  By: <u>/s/ Tamar N. Dolcourt</u> John A. Simon (P61866) Tamar N. Dolcourt (P73425) Leah R. Imbrogno (P79384) 500 Woodward Ave., Ste. 2700 Detroit, MI 48226 Phone: (313) 234-7100 jsimon@foley.com tdolcourt@foley.com limbrogno@foley.com  <i>Counsel to the City of Detroit, Michigan</i>
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Dated: July 7, 2015